

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA,

*

*

Plaintiff,

*

v.

* Civil Action No. 22-cv-02448-ELH

*

HUMPHREY-STAVROU ASSOCIATES INC., *

et al.,

*

*

Defendants.

*

**CONSENT MOTION TO APPROVE AND ENTER PROPOSED CONSENT
ORDER**

Plaintiff United States of America moves the Court to approve the attached Proposed Consent Order resolving this litigation as to (a) Stavrou Associates, Inc. and R & S LLC (“Developer Defendants”), (b) Glenmore Associates LP, Windsor Family Associates LP, Windsor Elderly Associates LP, Rainier Manor 2 LP, Chapel Springs LP, Belle Hill Manor LP, Hammarlee House Associates LP, Oak Grove Associates LP, and Hampshire Village Associates LP (“Owner Defendants”), and (c) Milltowne Associates, LP and Howard County Housing Commission (collectively “Rule 19 Defendants,” and together with Developer Defendants and Owner Defendants, “Stavrou Defendants”) and to enter the Consent Order as the Judgment of the Court as to the Stavrou Defendants. The grounds for this Motion are set forth in the attached Proposed Consent Order. The Stavrou Defendants consent to this motion.

Dated: November 22, 2022

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2022, I caused the foregoing Consent Motion to Approve and Enter Proposed Consent Order to be served on counsel for the Stavrou Defendants via electronic mail at the following address:

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